

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

DANA ALBRECHT,
Plaintiff

v.

JUDGE JOHN PENDLETON, solely in his official capacity as a Judge of the New Hampshire Circuit Court;

REFEREE SCOTT MURRAY, solely in his official capacity as a referee pursuant to N.H. Rev. Stat. § 490-F:15 for the State of New Hampshire;

JUDGE ELLEN CHRISTO, solely in her official capacity as the Administrative Judge of the New Hampshire Circuit Court, and her successor(s) in office;

CHIEF JUSTICE GORDON MACDONALD,
JUSTICE JAMES P. BASSETT, JUSTICE ANNA BARBARA HANZ MARCONI,
JUSTICE PATRICK E. DONOVAN,
JUSTICE MELISSA COUNTWAY, solely in their official capacities as justices of the New Hampshire Supreme Court, and their successor(s) in office;

ERIN CREEGAN, solely in her official capacity as General Counsel of the New Hampshire Judicial Branch, and her successor(s) in office,

TRACY MEYER, solely in her official capacity as the Clerk of the 10th Circuit District Court, Hampton, New Hampshire, and her successor(s) in office;

Civil Action No. 1:25-CV-00093

(continued on next page)

THE 24 MEMBERS OF THE
NEW HAMPSHIRE JUDICIAL COUNCIL,
solely in their official capacities as
members of the council, and their
successor(s) in office;

CHARLES M. ARLINGHAUS, solely in his
official capacity as Commissioner at the
New Hampshire Department of
Administrative Services, and his
successors(s) in office;

THE NEW HAMPSHIRE PUBLIC
DEFENDER; a 501(c)(3) corporation;

JOHN FORMELLA, solely in his official
capacity as Attorney General of the State
of New Hampshire, and his successor(s) in
office;

JOHN VENTURA, solely in his official
capacity as Police Prosecutor for the Town
of Seabrook, New Hampshire, and his
successor(s) in office;

DANIEL LAWRENCE, solely in his official
capacity as Sergeant for the Seabrook
Police Department, and his successor(s)
in office;

KASSANDRA STORMS a/k/a
KASSANDRA KAMINSKI, solely in her
official capacity as a patrol officer for the
Seabrook Police Department, and her
successor(s) in office;

THE TOWN OF SEABROOK, a municipal
corporation in New Hampshire;

(continued on next page)

THOMAS W. FOWLER, solely in his official capacity as Chief of Police for the Town of Salisbury, Massachusetts, and his successor(s) in office;

ANTHONY KING, solely in his official capacity as former Lieutenant of the Police Department for the Town of Salisbury, Massachusetts, and his successor(s) in office;

PATRICK SZYMKOWSKI, solely in his official capacity as a patrol officer of the Police Department for the Town of Salisbury, Massachusetts, and his successor(s) in office;

THE TOWN OF SALISBURY, a municipal corporation in Massachusetts,

Defendants

DEFENDANTS' ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE RESPONSIVE PLEADING

NOW COMES the Defendants, Town of Salisbury, Thomas W. Fowler, Patrick Szymkowski and Anthony King, who respectfully move this Honorable Court for a brief extension of time to respond to Plaintiff's Amended Complaint, setting the deadline to file a responsive pleading to July 14, 2025. The Defendants have conferred with the Plaintiff pursuant to Local Rule 7.1 regarding this motion and Plaintiff has assented.

WHEREFOR, the Defendants, Town of Salisbury, Thomas W. Fowler, Patrick Szymkowski and Anthony King, respectfully request this Honorable Court enter an order setting the deadline to file a responsive pleading as July 14, 2025.

Respectfully submitted,

Town of Salisbury, Thomas W. Fowler,
Patrick Szymkowski and Anthony King,

By their attorneys,

/s/ Liam Scully

Liam D. Scully
Scully & Lagos
Ten Post Office Square
Suite 1330
Boston, MA 02109
[\(617\) 307-5056](tel:(617)307-5056)
N.H. Bar No. 16875

/s/ Joseph A. Padolsky

Joseph A. Padolsky (BBO# 679725)
Douglas I. Louison (BBO# 545191)
Louison, Costello, Condon & Pfaff, LLP
Ten Post Office Square, Suite 1330
Boston, MA 02109
ipadolsky@lccplaw.com
dlouison@lccplaw.com
(617) 439-0305

Dated: July 7, 2025

Statement of Concurrence

I, Joseph A. Padolsky, hereby certify that pursuant to LR 7.1(c), I have made a good faith attempt to obtain concurrence in the relief sought herein and the plaintiff has assented.

/s/Joseph A. Padolsky

Joseph A. Padolsky

Certificate of Service

I, Joseph A. Padolsky, hereby certify that on this date a copy of the foregoing filing was forwarded to counsel of record, via ECF.

/s/Joseph A. Padolsky

Joseph A. Padolsky

Dated: July 7, 2025